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14 Attorneys for Defendant
CHIPOTLE MEXICAN GRILL, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA FRESNO DIVISION

18 VIVIAN SALAZAR, an individual
19 and on behalf of all others similarly
situated.

Plaintiff,

V.

22 CHIPOTLE MEXICAN GRILL, INC.
23 a Delaware Corporation; and DOES 1
through 10, inclusive.

Defendants.

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Attorneys for Defendant
CHIPOTLE MEXICAN GRILL, INC.

CASE NO.: 2:21-CV-01805-KJM-DB
ASSIGNED TO THE HONORABLE
JUDGE KIMBERLY J. MUELLER

**SECOND JOINT STIPULATION TO
EXTEND TIME FOR DEFENDANT
CHIPOTLE MEXICAN GRILL, INC.
TO RESPOND TO INITIAL
COMPLAINT BY MORE THAN 28
DAYS AND ORDER**

Complaint served: September 30, 2021
Current Deadline: November 25, 2021
New Deadline: December 16, 2021

1 Pursuant to Local Rule 144, Plaintiff Vivian Salazar (“Plaintiff”) and
2 Defendant Chipotle Mexican Grill, Inc. (“Defendant”) (collectively Plaintiff and
3 Defendant are referred to as the “Parties”), by and through their respective counsel,
4 stipulate to extend the time for Defendant to respond to Plaintiff’s complaint.
5 The Parties stipulate as follows:

6 1. On September 30, 2021, Plaintiff filed her Complaint in this action
7 alleging violations of the Americans with Disabilities Act of 1990 and the Unruh
8 Civil Rights Act;

9 2. Defendant was served on October 7, 2021;

10 3. Defendant’s responsive pleading was originally due on October 28,
11 2021;

12 4. On October 28, 2021, the Parties stipulated to extend Defendant’s time
13 to respond to November 25, 2021 [Doc. 6];

14 5. Since then, the Parties have in good faith engaged in settlement
15 discussions;

16 4. The Parties met and conferred and agreed to extend the deadline for
17 Defendant to respond to the Complaint to December 16, 2021, to allow additional
18 time to explore the potential for early resolution;

19 5. This request is the second request for an extension of time;

20 6. This change will not alter the date of any other event or deadline
21 already fixed by this Court; and

22 7. This request is not for the purposes of delay.

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1 IT IS HEREBY STIPULATED by and between the Parties that Defendant
2 has until December 16, 2021, to respond to Plaintiff's complaint.

3 **SO STIPULATED.**

4 DATE: November 24, 2021

5 WILSHIRE LAW FIRM

6 By: /s/ Binyamin Manoucheri
7 Thiago M. Coelho
8 Binyamin I. Manoucheri
9 Attorneys for Plaintiff
VIVIAN SALAZAR

10 DATE: November 23, 2021

11 MARTENSON, HASBROUCK &
12 SIMON LLP

13 By: /s/ Michelle A. Patroni
14 Elizabeth Bulat Turner
15 Michelle A. Patroni
Danielle J. Vukovich
16 Attorneys for Defendant
17 CHIPOTLE MEXICAN GRILL, INC.

ORDER

Having reviewed the Parties' stipulation, and good cause appearing, this Court grants the stipulation to extend the time for Defendant to respond to Plaintiff's Complaint to December 16, 2021.

IT IS SO ORDERED.

6 | DATE: December 2, 2021.

W. Andrew Miller
CHIEF UNITED STATES DISTRICT JUDGE